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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ADHAM ZAAROUR, Individually and On Behalf  
of Others Similarly Situated,

Plaintiffs,

vs.

COLTER ENERGY SERVICES USA INC.,

Defendant.

**Case No. 2:24-cv-00443-GMN-HAM**

**STIPULATION AND [PROPOSED]  
ORDER TO STAY DEADLINE TO  
SUBMIT A PROPOSED DISCOVERY  
PLAN AND SCHEDULING ORDER  
PENDING THE COURT'S RULING ON  
PLAINTIFF'S MOTION FOR  
CONDITIONAL CERTIFICATION (ECF  
NO. 7)**

Plaintiff Adham Zaarour and Defendant Colter Energy Services USA Inc., by and through their counsel of record, stipulate to stay the deadline to submit a proposed discovery plan and scheduling order pending the Court's ruling on Plaintiff's Motion for Conditional Certification Pursuant to 29 U.S.C. § 216(b) and Issuance of Court-Authorized Notice (ECF No. 7).

On March 11, 2024, Plaintiff filed a Motion for Conditional Certification, which seeks permission to send a Court-authorized notice to putative collective members to apprise them of their rights under the Fair Labor Standards Act (FLSA) and to give them an opportunity to join this case as party plaintiffs by submitting a written consent to join the collective action pursuant to 29 U.S.C. § 216(b). *See* ECF No. 7. Resolution of Plaintiff's Motion for Conditional Certification will necessarily dictate and significantly alter

the scope of the lawsuit moving forward, the issues that will need to be addressed in discovery, and the time necessary to get this case ready for a trial.

As such, requiring the Parties to submit a proposed discovery plan and scheduling order would be premature at this time, given that a proposed discovery plan and scheduling order would look very different depending on which way the Court rules on Plaintiff's Motion for Conditional Certification.

Given that the Court is still considering the Motion for Conditional Certification, the Parties believe it is best to submit a Proposed Discovery Plan and Scheduling Order after a ruling on the Motion. At that time, the Parties will be in a better position to discuss the discovery that will be needed and the amount of time necessary for both sides to gather evidence.

THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendant as follows:

1. The deadline for the parties to submit a proposed discovery plan and scheduling order shall be stayed pending decision on Plaintiff's Motion for Conditional Certification (ECF No. 7);
2. Should the Court grant Plaintiff's Motion for Conditional Certification in full or in part, the Parties agree to (1) conduct a Rule 26(f) conference within 14 days of the end of any opt-in period, and (2) file the proposed Discovery Plan and Scheduling Order within 14 days after such Rule 26(f) conference;
3. Should the Court deny Plaintiff's Motion for Conditional Certification in full, the Parties agree to (1) conduct a Rule 26(f) conference within 14 days after the issuance of the order, and (2) file a proposed Discovery Plan and Scheduling Order within 28 days after the issuance of the order.

Respectfully and jointly submitted on May 17, 2024

/s/ William M. Hogg

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13 **IT IS SO ORDERED.**

14 Dated: May 21, 2024

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17 U.S. MAGISTRATE JUDGE  
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